UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

LATIN AMERICAN MUSIC CO. INC, et als	*	Case No. 96-2312 (PG)
Plaintiffs,	*	,
vs.	*	
THE ARCHDIOCESE OF SAN JUAN ROMAN CATHOLIC & APOSTOLIC	*	
CHURCH, et als Defendants	*	
TURABO RADIO CORP, et als	_* _*	Case No. 97-2356
Plaintiffs, [']	*	(PG)
VS.	*	
ASOCIACION DE COMPOSITORES Y EDITORES DE MUSICA	*	
LATINOAMERICANA, INC. et als Defendants	* * *	
TURABO RADIO CORP., et als Plaintiffs,	* * *	Case No. 98-1597 (PG)
V.	*	
PEER; PEER PR; et als Defendants	* * *	
PEER INTERNATIONAL CORP., et als Plaintiffs	 * *	Case No. 97-2875 (PG)
LATIN AMEDICAN MUSIC CO. INC	*	
LATIN AMERICAN MUSIC CO., INC., THE ARCHDIOCESE OF SAN JUAN,	*	
Et als Defendants	*	
	-	

MOTION FOR ATTORNEYS' FEES

COMES NOW, Codefendants and Third Party Plaintiffs, Turabo Radio Corp. ARSO Radio Corporation WNEL-AM a/k/a Radio Tiempo and WTVA-FM a/k/a Salsoul; El Mundo Broadcasting Corp., WKAQ-FM a/k/a KQ105; and Prime Media Broadcasting Group, Inc., WZNT-FM a/k/a Z-93 through their undersigned attorney and very respectfully state and pray:

- 1. This Court dismissed with perjudice the LAMCO Parties' claims, counterclaims and affirmative defenses. This Court also authorized the parties to submit their application for attorneys' fees.
- 3. The Codefendants and Third Party Plaintiffs, Turabo Radio Corp. ARSO Radio Corporation WNEL-AM a/k/a Radio Tiempo and WTVA-FM a/k/a Salsoul; El Mundo Broadcasting Corp., WKAQ-FM a/k/a KQ105; and Prime Media Broadcasting Group, Inc., WZNT-FM a/k/a Z-93 are entitled to an award of attorneys' fees as follows:
- a. Civil No. 97-2356 = \$ 57,975.00 see Docket Number 381.

WHEREFORE it is respectfully prayed that this Honorable court award the codefendants and Third Party Plaintiffs, Turabo Radio Corp. ARSO Radio Corporation WNEL-AM a/k/a Radio Tiempo and WTVA-FM a/k/a Salsoul; El Mundo Broadcasting Corp., WKAQ-FM a/k/a KQ105; and Prime Media Broadcasting Group, Inc., WZNT-FM a/k/a Z-93 the Attorneys fees of \$57,975.00.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, 31 day of October, 2005.

I hereby certify the on October 31, 2005, I electronically filed the foregoing with the clerk of the court using the CM/ECF system which will send notification of such filing to the following: ANGEL N. CARO, ESQ., ERNESTO HERNANDEZ MILAN, ESQ., BARRY I. SLOTNICK, ESQ., DIEGO A RAMOS, ESQ., RICHARD H REIMER, ESQ, FRANCISCO A BESOSA, ESQ., NESTOR M. MELENDEZ GOMEZ, ESQ.

DORA M. PENAGARICANO, ESQ., MAYRA M. GONZALEZ-REYES, ESQ., LUIS R. PEREZ GIUSTI, ESQ., JORGE R. ROIG COLON, ESQ. AND JANE BECKER WHITAKER, ESQ.

s/ROBERTO SUEIRO DEL VALLE USDC No. 207801 Tulipán 170 Urb. San Francisco San Juan, PR 00927-6221 Tel.: 753-4712Fax: 274-0191

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